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13
14 UNITED STATES DISTRICT COURT
15
16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17 IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

18 This Document Related to:
19
20 DIRECT PURCHASER ACTIONS

**DECLARATION OF CATHLEEN H.
HARTGE IN SUPPORT OF DEFENDANT
LG ELECTRONICS, INC.'S
ADMINISTRATIVE MOTION TO SEAL
IN SUPPORT OF REPLY IN SUPPORT
OF MOTION FOR PARTIAL SUMMARY
JUDGMENT ON WITHDRAWAL
GROUNDS**

23 [Administrative Motion to Seal and [Proposed]
Order filed concurrently herewith]

25 Judge: Honorable Samuel Conti
Date: February 6, 2015
26 Time: 10:00am
Crtrm.: 1, 17th Floor

1 I, Cathleen H. Hartge, hereby declare:

2 1. I am an attorney with the law firm Munger, Tolles & Olson LLP, counsel of
3 record for Defendant LG Electronics, Inc. (“LGE”), in the above entitled action. I am licensed
4 in the State of California and admitted to practice before this Court. I make this declaration
5 based on my personal knowledge and, if called upon as a witness, could and would testify
6 competently as to the matters set forth below.

7 2. Pursuant to Civil Local Rule 7-11 and 79-5, I make this declaration in support of
8 the LGE’s Administrative Motion to Seal.

9 3. LGE seeks permission to file under seal the highlighted portions of the sealed
10 version of its Reply in Support of its Motion for Partial Summary Judgment on Withdrawal
11 Grounds.

12 4. The portions of the document referenced in Paragraph 3 contain discussion,
13 analysis, references to, or information taken directly from, material designated by Defendants
14 Chunghwa and Philips in this matter as “CONFIDENTIAL” under the Stipulated Protective
15 Order (Dkt. No. 306) in this case.

16 5. LGE further seeks permission to file under seal the following documents in their
17 entirety:

18 (a) Exhibit A of the Declaration of Cathleen H. Hartge in Support of LGE’s
19 Reply in Support of its Motion for Partial Summary Judgment on Withdrawal Grounds (“Hartge
20 Declaration”);

21 (b) Exhibit C of the Hartge Declaration.

22 6. The document referenced in paragraph 5(a) has been designated
23 “CONFIDENTIAL” by Chunghwa under the Stipulated Protective Order (Dkt. No. 306).

24 7. The document referenced in paragraph 5(b) is an excerpt of the transcript of a
25 Philips witness designated “CONFIDENTIAL” by Philips under the Stipulated Protective Order
26 (Dkt. No. 306).

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8. LGE seeks to submit the above material under seal in good faith in order to comply with the Stipulated Protective Order in this action and the applicable Local Rules. Because the information LGE seeks to submit under seal has been designated as Confidential by other parties, LGE is filing the accompanying Administrative Motion, and will be prepared to file unredacted versions of the above-referenced documents in the public record if required by Civil Local Rule 79-5(e).

I declare under penalty of perjury under the laws of California that the foregoing is true and correct.

Executed on the 23rd day of January, 2015 in San Francisco, California.

/s/ Cathleen H. Hartge
CATHLEEN H. HARTGE